



February 3, 2020

Commissioner Robert Taub, Chair
Commissioner Michael Kubayana, Vice Chair
Commissioner Mark Acton
Commissioner Ann Fisher
Commissioner Ashley Poling
Postal Regulatory Commission
901 New York Avenue, NW
Suite 200
Washington, DC 20268-0001

Re: Docket RM2017-3

Dear Commissioners:

On behalf of the Visiting Nurse Service of New York (VNSNY), thank you for the opportunity to comment on the Postal Regulatory Commission's (PRC) proposal to regulate how future postage prices are determined by the United States Postal Service (USPS).

As one of the largest not-for-profit home and community-based health care organizations in the United States, VNSNY provides care to more than 44,000 patients and health plan members every day. Our organization relies on charitable contributions to provide care to thousands of vulnerable individuals who lack adequate health insurance or financial resources. We also communicate with our patients and members on a regular basis, including communications mandated by state or federal law.

VNSNY urges the Commission to reconsider its proposal due to the likelihood that postage rates could be raised past the rate of inflation, which could negatively impact not-for-profit organizations like ours that have fixed budgets and rely on traditional mail to raise charitable contributions and communicate with patients and members.

Charitable Care

For more than 125 years, VNSNY has been providing healthcare services to some of New York's most vulnerable and marginalized populations. Each year VNSNY provides tens of millions of dollars in charitable care and community benefit programs. These wide-ranging programs improve the lives of tens of thousands of New Yorkers, young and old, and deliver free and discounted home and community-based healthcare services to thousands of under- and uninsured individuals. To provide this care, VNSNY has to raise money throughout the year. We rely heavily on donations that we elicit through the mail.

In 2019, we sent approximately 450,000 letters through the USPS. If the proposed change is adopted, our outreach will be reduced and/or our costs will rise, impacting our charitable care. Last year we raised over \$6 million for charitable programs, approximately 65% of which came as a result of fundraising requests received in the mail.

Member and Patient Communications

Our affiliated health plan, VNSNY CHOICE, cares for more than 25,000 Medicare and Medicaid members (most of whom are dually eligible) and uses traditional mail to ensure members receive important materials such as provider directories and regular newsletters. We are required by New York State (NYS) to provide hard copies of many of these new member materials at the time of enrollment, and traditional mail remains the most trusted or preferred form of communication among many of our members. *Last year we sent over 974,000 marketing/member communications.* These communications keep members abreast of new services that are available and provide healthy living tips to a population that has a number of health challenges.

In addition, the operational communications sent by VNSNY/CHOICE and our vendor partners to our patients, members, and healthcare service providers *make up an even larger portion of our mailings – several million pieces of mail –* including authorization/denial notices, explanations of benefits, documentation related to grievances and appeals, and physician orders. These are also required by NYS and/or the Centers for Medicare & Medicaid Services (CMS) to be sent using traditional mail.

Conclusion

The backbone of our fundraising efforts and communications with our members and patients continues to be traditional mail. The proposed postage rate changes threaten to undermine our efforts and strain our limited resources. For these reasons, we ask that you reconsider the proposed formula.

Sincerely,

A handwritten signature in black ink, appearing to read 'Michael Bernstein', with a large, stylized flourish at the end.

Michael Bernstein

Executive Vice President and Chief Administrative Officer
Visiting Nurse Service of New York